

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2004 JUN 18 P-12-24

Ralph R. Nelson :
Plaintiff : U.S. DISTRICT COURT
CASE NO. 04-10845-CAO MASS.
v. :
Tonya Marie Coffey (Nelson), et al. :
Defendants :

MOTION FOR EXTENSION OF TIME TO MOVE OR OTHERWISE PLEAD FOR
DEFENDANTS CARLA TOWNSEND, ROBERT SUVER, VIRGINIA BROWN,
SANDRA MENDENHALL, DEBBIE MARTINEAU, HOLLY PAYNE,
AND JOEL SALWAY

The above defendants move for an extension of time to move or otherwise plead for 30 days pursuant to Federal Rule of Civil Procedure 12.

Additional support is contained in the Memorandum attached hereto.

Respectfully submitted,



Mark Landes (0027227)
Isaac, Brant, Ledman & Teetor, LLP
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(614-365-9526 (Facsimile)

MEMORANDUM

Pro se plaintiff complains in a 300 paragraph complaint against several Clark County officials. The gravamen of his complaint concerns his child support.

The undersigned counsel has just received the complaint and the direction to defend these county officials.

Given the complexity and density of the complaint and the multiple defenses that should be pled, along with the anticipated Motion to Change Venue, we ask the court's forbearance in receiving this Motion to Extend.

We will promptly file a Motion for Admission Pro Hac Vice for the limited purpose of moving to change venue.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was mailed by ordinary U.S. mail, postage prepaid, to the undersigned, this 1st day of June, 2004:

Ralph R. Nelson
57 Charter Street, Apt. 2A
Boston, MA 02113

Tonya Marie Coffey
3316 Bristol Drive
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Sherri Z. Heller
Commissioner of the Federal Office of
Child Support Enforcement
The U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dannetta Graves, Director
14 West Fourth Street
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China L. Widener, Assistant Director
Ohio Department of Job and Family Services
30 E. Broad St., 32nd Floor
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Marilyn Ray Smith
Deputy Commissioner of Child Support
The Commonwealth of Massachusetts
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Child Support Enforcement Division
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Mark Landes